

Exhibit 36

Robyn Abraham
January 17, 2019

1

Page 1

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 ROBYN ABRAHAM,

5 Plaintiff, :

6 - against -

7 ABBY LEIGH in her individual capacity
8 and as Executrix of the ESTATE OF
9 MITCH LEIGH, THE VIOLA FUND, ABBY LEIGH
10 LTD, MARTHA WASSERMAN in her individual
11 capacity and as Executrix of the ESTATE
12 OF DALE WASSERMAN, HELLEN DARION, in her
13 individual capacity and as Executrix of
14 the ESTATE OF JOSEPH DARION, and
15 ALAN HONIG,

16 Defendants. :

17 666 Fifth Avenue
18 New York, New York

19 January 17, 2019
20 9:39 a.m.

21 VIDEOTAPED EXAMINATION BEFORE
22 TRIAL of ROBYN ABRAHAM, the Plaintiff herein,
23 taken by the Defendants, pursuant to Court
24 Order, held at the above-mentioned time and place,
25 before Michelle Lemberger, a Notary Public of
the State of New York.

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22 to 25

<p style="text-align: right;">Page 22</p> <p>1 Robyn Abraham</p> <p>2 answered. That's it. She's answered</p> <p>3 the question.</p> <p>4 MR. LAFAYETTE: I have not</p> <p>5 asked that question before.</p> <p>6 MS. SHIN: Yes or not.</p> <p>7 MR. LAFAYETTE: My question</p> <p>8 was -- and I'll ask the court</p> <p>9 reporter to read it back.</p> <p>10 (Whereupon, at this time, the requested</p> <p>11 portion was read by the reporter.)</p> <p>12 MS. SHIN: Same objection.</p> <p>13 It's been answered.</p> <p>14 A. I'm deferring to my counsel.</p> <p>15 MR. LAFAYETTE: Are you</p> <p>16 directing your client not to answer</p> <p>17 the question?</p> <p>18 MS. SHIN: No. She's already</p> <p>19 answered it.</p> <p>20 A. I've answered it.</p> <p>21 Q. Do you have any document in which</p> <p>22 Ms. Bases gives you permission to communicate</p> <p>23 with Martha Wasserman?</p> <p>24 MS. SHIN: Objection.</p> <p>25 Foundation. Asked and answered.</p>	<p style="text-align: right;">Page 24</p> <p>1 Robyn Abraham</p> <p>2 Wasserman?</p> <p>3 A. I believe it was Dr. Wayne Dyers.</p> <p>4 Q. And can you tell me the</p> <p>5 circumstances of Mr. -- Dr. Dyers introducing</p> <p>6 you to Ms. Wasserman?</p> <p>7 MS. SHIN: Objection to form.</p> <p>8 A. I don't understand the question.</p> <p>9 Q. Okay.</p> <p>10 THE WITNESS: Can I get some</p> <p>11 tea? I've been kind of asking and</p> <p>12 I'm kind of wired in here.</p> <p>13 MS. SHIN: Let's take a break.</p> <p>14 Is there anything that she can drink?</p> <p>15 MR. LAFAYETTE: Let's go off</p> <p>16 the record.</p> <p>17 VIDEOGRAPHER: It is 10:00 a.m.</p> <p>18 and we are off the record.</p> <p>19 (Discussion held off the</p> <p>20 record.)</p> <p>21 VIDEOGRAPHER: The time is</p> <p>22 10:02 a.m. and we're back on the</p> <p>23 record.</p> <p>24 BY MR. LAFAYETTE:</p> <p>25 Q. And after you were introduced to</p>
<p style="text-align: right;">Page 23</p> <p>1 Robyn Abraham</p> <p>2 Form.</p> <p>3 A. I've answered the question.</p> <p>4 MS. SHIN: You can answer it,</p> <p>5 if you understood the question.</p> <p>6 A. I'm not sure I understood it.</p> <p>7 MR. LAFAYETTE: Could we read</p> <p>8 it back, please?</p> <p>9 (Whereupon, at this time, the requested</p> <p>10 portion was read by the reporter.)</p> <p>11 A. I don't, no. I don't know.</p> <p>12 Q. Have you ever met Martha Wasserman?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 A. Many times.</p> <p>16 Q. When did you first meet?</p> <p>17 A. I met her at a conference in April,</p> <p>18 I believe of 2013 in Denver.</p> <p>19 Q. And before that, had you ever spoken</p> <p>20 to Martha Wasserman?</p> <p>21 A. I had no idea who she was.</p> <p>22 Q. And how did you meet Ms. Wasserman?</p> <p>23 A. We were introduced at a conference</p> <p>24 in Denver.</p> <p>25 Q. And who introduced you to Martha</p>	<p style="text-align: right;">Page 25</p> <p>1 Robyn Abraham</p> <p>2 Ms. Wasserman, did you have a discussion with</p> <p>3 her?</p> <p>4 A. No, not really.</p> <p>5 Q. Okay. And when did you next</p> <p>6 communicate with her?</p> <p>7 A. Well, I think she invited me to</p> <p>8 lunch that day, and she told me about Man of</p> <p>9 La Mancha and the problems they've been</p> <p>10 having over the years.</p> <p>11 Q. And can you tell me what she said?</p> <p>12 A. Oh, from -- I can't remember</p> <p>13 exactly, but she said that there had been a</p> <p>14 number of -- that she loved the musical, it</p> <p>15 was her husband's pride and joy. And that</p> <p>16 there had been problems with it over the</p> <p>17 years with the rights holders and issues and</p> <p>18 getting it up and running, and a number of</p> <p>19 things. But I couldn't tell you exactly the</p> <p>20 contents of the conversation from five years</p> <p>21 ago, six years ago.</p> <p>22 Q. Okay. And after that lunch, did you</p> <p>23 have any other communications with her at the</p> <p>24 conference?</p> <p>25 A. At the conference, I don't know. I</p>

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26 to 29

<p style="text-align: right;">Page 26</p> <p>1 Robyn Abraham</p> <p>2 know we were introduced and I recall that Dr.</p> <p>3 Dyers had recommended me because I knew him.</p> <p>4 He used to be on Public Television and I</p> <p>5 worked at -- I worked for PBS in Miami where</p> <p>6 he used to appear.</p> <p>7 Q. When you say he recommended you,</p> <p>8 could you explain what you mean by that?</p> <p>9 A. He just recommended that Martha talk</p> <p>10 to me.</p> <p>11 Q. For any particular purpose?</p> <p>12 A. Well, he thought, Dr. Dyers thought</p> <p>13 I am very good at what I do, so he suggested</p> <p>14 Martha talk to me.</p> <p>15 Q. And did you have an occasion after</p> <p>16 the conference to communicate with</p> <p>17 Ms. Wasserman?</p> <p>18 A. Yes. She gave me her card and told</p> <p>19 me to get in touch. And wanted to basically</p> <p>20 have a conversation of, you know, what I</p> <p>21 thought would be good to restart Man of La</p> <p>22 Mancha, and I told her I'd think about it.</p> <p>23 Q. And when did she say that to you?</p> <p>24 A. During the conference.</p> <p>25 Q. And did you get back in touch with</p>	<p style="text-align: right;">Page 28</p> <p>1 Robyn Abraham</p> <p>2 Q. In this e-mail, you mention that Man</p> <p>3 of La Mancha is your favorite musical, do you</p> <p>4 see that?</p> <p>5 A. Yes.</p> <p>6 Q. Is it your favorite musical?</p> <p>7 A. Yes.</p> <p>8 Q. It in it you say you're Disney</p> <p>9 trained, highly successful international</p> <p>10 entertainment media attorney, solicitor, MBA.</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. And can you tell me what you mean by</p> <p>14 a Disney-trained entertainment media</p> <p>15 attorney?</p> <p>16 A. I think it's self explanatory, but</p> <p>17 what's the question?</p> <p>18 Q. What do you mean by Disney trained?</p> <p>19 A. I was trained by the general counsel</p> <p>20 of Disney.</p> <p>21 Q. You worked for him?</p> <p>22 A. Yes. I worked for Joe Shapiro who</p> <p>23 was the Disney general counsel, correct.</p> <p>24 Q. And you were outside counsel for</p> <p>25 Disney?</p>
<p style="text-align: right;">Page 27</p> <p>1 Robyn Abraham</p> <p>2 her?</p> <p>3 A. Well, she gave me her card and asked</p> <p>4 me to, so, yes.</p> <p>5 Q. Ms. Abraham, we're going to mark a</p> <p>6 document as Abraham Exhibit 1 which bears</p> <p>7 Bates stamped ABR 001065.</p> <p>8 (Whereupon, at this time, the</p> <p>9 reporter marked the above-mentioned</p> <p>10 e-mail chain as Abraham Exhibit 1 for</p> <p>11 identification.)</p> <p>12 BY MR. LAFAYETTE:</p> <p>13 Q. Drawing your attention to Bates</p> <p>14 stamp ABR 001068, and an e-mail that begins</p> <p>15 on April 29, 2013, at 2:10 p.m.</p> <p>16 Do you see that e-mail?</p> <p>17 A. No, I don't. I'm getting there.</p> <p>18 (Witness peruses document.)</p> <p>19 A. At what time?</p> <p>20 Q. It's April 29, 2013 at 2:10 p.m.</p> <p>21 A. Yes.</p> <p>22 Q. Is that your first communication</p> <p>23 with Ms. Wasserman after the Denver</p> <p>24 conference?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 29</p> <p>1 Robyn Abraham</p> <p>2 A. Correct, correct.</p> <p>3 Q. And in what way did he train you?</p> <p>4 MS. SHIN: Objection to form.</p> <p>5 A. Well, that's like an impossible</p> <p>6 question to answer. It's how Disney runs</p> <p>7 television. I ran the television shows for</p> <p>8 Disney in Florida, in Orlando.</p> <p>9 Q. And what television shows were</p> <p>10 those?</p> <p>11 A. The new Mickey Mouse Club.</p> <p>12 Q. Any other ones?</p> <p>13 A. Well, I did other shows for them in</p> <p>14 bits and pieces. Whatever was requested.</p> <p>15 And I worked with Ted Kay at the Disney</p> <p>16 channel and a number of other executives at</p> <p>17 Disney in doing what they requested in terms</p> <p>18 of legal and business affairs.</p> <p>19 Q. Did any of those projects involve</p> <p>20 entertainment other than television?</p> <p>21 A. Well, they were all musical, so,</p> <p>22 yes.</p> <p>23 Q. When you say they were all musical,</p> <p>24 what do you mean?</p> <p>25 A. Well, there was music licensing,</p>

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<p style="text-align: right;">Page 46</p> <p>1 Robyn Abraham</p> <p>2 and she said she'd let me know.</p> <p>3 Q. And isn't it correct that you state,</p> <p>4 I'd be delighted to help you expand the Dale</p> <p>5 Wasserman brand as well as to help you stage</p> <p>6 his lesser-known plays in the U.S. and</p> <p>7 international.</p> <p>8 A. If that's what she wanted to do and</p> <p>9 that's her request, then I said, If that's</p> <p>10 what you want, I'm happy to help.</p> <p>11 Q. And when did she say that it was</p> <p>12 something that she wanted?</p> <p>13 A. At lunch, the day we met.</p> <p>14 Q. That's in Denver?</p> <p>15 A. Correct.</p> <p>16 Q. And Ms. Wasserman responded that she</p> <p>17 wanted to have a few days to think about it,</p> <p>18 correct?</p> <p>19 A. I don't recall.</p> <p>20 Q. Can you look at the top e-mail and</p> <p>21 I'll ask if that refreshes your recollection.</p> <p>22 (Witness peruses document.)</p> <p>23 A. What's the question?</p> <p>24 MR. LAFAYETTE: Can you read it</p> <p>25 back?</p>	<p style="text-align: right;">Page 48</p> <p>1 Robyn Abraham</p> <p>2 that begins on page ABR 1066, the bottom of</p> <p>3 the page, where it says on April 30, 2013 at</p> <p>4 twelve o'clock p.m., R. Abraham wrote, do you</p> <p>5 see that?</p> <p>6 A. I see what it says.</p> <p>7 Q. Okay?</p> <p>8 A. I don't --</p> <p>9 Q. Is that a true and correct copy of</p> <p>10 an e-mail that you sent to Martha Wasserman?</p> <p>11 A. I don't --</p> <p>12 Q. On April 30, 2013?</p> <p>13 A. I don't know. I don't know.</p> <p>14 Q. Looking above that, at the e-mail</p> <p>15 from Martha Wasserman dated April 30, 2013 at</p> <p>16 2:51 p.m., do you see that?</p> <p>17 A. Um-hum. Yes.</p> <p>18 Q. Is that a true and correct copy of</p> <p>19 an e-mail that you received from Martha</p> <p>20 Wasserman?</p> <p>21 A. I don't recall.</p> <p>22 MS. SHIN: I'm sorry, where are</p> <p>23 you looking?</p> <p>24 MR. LAFAYETTE: I'm looking on</p> <p>25 page ABR 1066, and there's an e-mail,</p>
<p style="text-align: right;">Page 47</p> <p>1 Robyn Abraham</p> <p>2 A. I don't know what you're asking me?</p> <p>3 (Whereupon, at this time, the requested</p> <p>4 portion was read by the reporter.)</p> <p>5 A. Whatever the e-mail says.</p> <p>6 Q. It says that she wanted to have a</p> <p>7 few days to think about it, correct?</p> <p>8 A. I'm looking at where that is.</p> <p>9 (Witness peruses document.)</p> <p>10 A. Oh, yes, the first sentence. It</p> <p>11 says, May I have a few days to think about</p> <p>12 it. Yes, I see that.</p> <p>13 Q. And notwithstanding, did you e-mail</p> <p>14 her the next day?</p> <p>15 A. I don't recall.</p> <p>16 Q. Can you take a look at the next</p> <p>17 e-mail on top of the e-mail from Martha</p> <p>18 Wasserman to which you just referred?</p> <p>19 (Witness peruses document.)</p> <p>20 A. I don't know. I don't know what the</p> <p>21 question is.</p> <p>22 Q. I asked you if it's true that the</p> <p>23 next day you wrote to Ms. Wasserman?</p> <p>24 A. I don't recall.</p> <p>25 Q. Okay. Taking a look at the e-mail</p>	<p style="text-align: right;">Page 49</p> <p>1 Robyn Abraham</p> <p>2 starts around the middle of the page</p> <p>3 from Martha Wasserman to R. Abraham,</p> <p>4 and it is dated April 30, 2013 at</p> <p>5 2:51 p.m., and I asked the witness is</p> <p>6 this a true and correct copy of an</p> <p>7 e-mail that she received from Martha</p> <p>8 Wasserman.</p> <p>9 A. I don't recall. It was more than</p> <p>10 five years ago, almost six years ago.</p> <p>11 MR. LAFAYETTE: I'm going to</p> <p>12 mark as Abraham Exhibit 2 an e-mail</p> <p>13 that bears the Bates stamp ABR</p> <p>14 000589.</p> <p>15 (Whereupon, at this time, the</p> <p>16 reporter marked the above-mentioned</p> <p>17 e-mail as Abraham Exhibit 2 for</p> <p>18 identification.)</p> <p>19 BY MR. LAFAYETTE:</p> <p>20 Q. Ms. Abraham, have you seen this</p> <p>21 e-mail before?</p> <p>22 A. I recognize it.</p> <p>23 Q. Okay. And is this e-mail a true and</p> <p>24 correct copy of an e-mail that you received</p> <p>25 from Martha Wasserman on Tuesday, April 30,</p>

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<p style="text-align: right;">Page 50</p> <p>1 Robyn Abraham</p> <p>2 2013 at 3:18 p.m.?</p> <p>3 A. I don't know if it was received on</p> <p>4 that day. But I do recognize it as being</p> <p>5 received at some point. It does look</p> <p>6 familiar.</p> <p>7 Q. And is it a true and correct copy of</p> <p>8 an e-mail that you received from Martha</p> <p>9 Wasserman?</p> <p>10 A. I believe so.</p> <p>11 Q. And the subject line says, Re Denver</p> <p>12 lunch follow-up.</p> <p>13 Do you see that?</p> <p>14 A. Yes, I do.</p> <p>15 Q. And when the subject line says Re,</p> <p>16 is it your understanding that that refers to</p> <p>17 a response to another e-mail?</p> <p>18 A. I don't know what it refers to.</p> <p>19 Q. And do you know if this e-mail was</p> <p>20 in response to an e-mail that you sent?</p> <p>21 A. I don't know.</p> <p>22 Q. Do you know if this e-mail was part</p> <p>23 of a chain?</p> <p>24 A. I don't know.</p> <p>25 Q. Now, Ms. Abraham, this is a document</p>	<p style="text-align: right;">Page 52</p> <p>1 Robyn Abraham</p> <p>2 MS. SHIN: Objection to form.</p> <p>3 A. I don't understand the question.</p> <p>4 Q. Do you take the position in this</p> <p>5 action that you lost certain e-mails due to a</p> <p>6 crash of your server by Go Daddy?</p> <p>7 A. Well, I don't know what happened,</p> <p>8 but I do know everything I received I sent to</p> <p>9 counsel in London, and sent everything as</p> <p>10 received as directed by Schillings Law Firm.</p> <p>11 Q. Okay. And did you print out certain</p> <p>12 e-mails to send to the Schillings Law Firm?</p> <p>13 A. Did I print out -- I was told to</p> <p>14 preserve the documents involving this case --</p> <p>15 Q. Okay.</p> <p>16 A. -- and forward to Schillings.</p> <p>17 Q. And when was that?</p> <p>18 A. When was that? I think it occurred</p> <p>19 sometime in 2014, after Mitch died.</p> <p>20 Q. And how did you preserve the</p> <p>21 documents?</p> <p>22 A. I forwarded them to Shillings Law</p> <p>23 Firm.</p> <p>24 Q. And how did you forward them to</p> <p>25 them?</p>
<p style="text-align: right;">Page 51</p> <p>1 Robyn Abraham</p> <p>2 that was not produced by you in e-mail</p> <p>3 format. Do you know why there is no e-mail</p> <p>4 format of this document?</p> <p>5 A. I don't know what e-mail format</p> <p>6 means.</p> <p>7 Q. That it's not in the form of a</p> <p>8 conventional native e-mail from your</p> <p>9 computer.</p> <p>10 MS. SHIN: Objection to form.</p> <p>11 A. I don't know how that happens or</p> <p>12 doesn't happen.</p> <p>13 Q. Do you understand that there are</p> <p>14 certain e-mails that you've produced in</p> <p>15 connection with this action for which you did</p> <p>16 not produce an original e-mail format?</p> <p>17 MS. SHIN: Objection to form.</p> <p>18 A. I don't understand the question.</p> <p>19 Q. Do you have a native e-mail on your</p> <p>20 computer for this document?</p> <p>21 MS. SHIN: Objection to form.</p> <p>22 A. What is a native e-mail?</p> <p>23 Q. An existing computer electronic</p> <p>24 e-mail, as opposed to a PDF or hard copy</p> <p>25 document?</p>	<p style="text-align: right;">Page 53</p> <p>1 Robyn Abraham</p> <p>2 A. Via zip file, via e-mail, as I was</p> <p>3 requested to do.</p> <p>4 Q. So you attached these documents to</p> <p>5 an e-mail and forwarded them to Schillings?</p> <p>6 MS. SHIN: Objection to form.</p> <p>7 A. I don't recall exactly. I just sent</p> <p>8 them to my attorneys.</p> <p>9 Q. And to your knowledge, did at some</p> <p>10 time thereafter, did you lose certain of the</p> <p>11 e-mails from your computer system?</p> <p>12 MS. SHIN: Objection to form.</p> <p>13 A. I don't know -- I don't know what</p> <p>14 happened, but I know that there are things</p> <p>15 that Go Daddy has experienced which have</p> <p>16 caused problems. So I can't say what caused</p> <p>17 that, I don't know.</p> <p>18 Q. And do you believe that when you say</p> <p>19 that Go Daddy has experienced -- when you say</p> <p>20 that there are things that Go Daddy has</p> <p>21 experienced which has caused problems, can</p> <p>22 you tell me what you mean by that?</p> <p>23 A. Well, it's public record that</p> <p>24 they've had crashes and hackings and things</p> <p>25 of that sort. So I'm just reading what was</p>

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<p style="text-align: right;">Page 54</p> <p>1 Robyn Abraham</p> <p>2 online, when the servers have been down and</p> <p>3 e-mails have been missing, something that's</p> <p>4 publically reported.</p> <p>5 Q. And do you believe that due to some</p> <p>6 kind of a Go Daddy crash, that you lost</p> <p>7 certain data?</p> <p>8 A. I don't know what happened. I'm not</p> <p>9 an IT person. I don't know what happened.</p> <p>10 Q. Did you delete any e-mails?</p> <p>11 A. No.</p> <p>12 Q. Did you create any e-mails?</p> <p>13 A. No.</p> <p>14 Q. Do you know when it was that you</p> <p>15 lost this data?</p> <p>16 A. No.</p> <p>17 Q. Do you know at what point in time</p> <p>18 you discovered this data was missing?</p> <p>19 A. No.</p> <p>20 Q. Have you been asked by your counsel</p> <p>21 for electronic versions of e-mail -- strike</p> <p>22 that.</p> <p>23 Have you been asked by your counsel</p> <p>24 for electronic versions of the e-mail that's</p> <p>25 been marked as Abraham Exhibit 2?</p>	<p style="text-align: right;">Page 56</p> <p>1 Robyn Abraham</p> <p>2 Q. Did you download the documents from</p> <p>3 your computer?</p> <p>4 MS. SHIN: Objection to form.</p> <p>5 A. I don't recall.</p> <p>6 Q. Did an outside vendor download any</p> <p>7 documents from your computer?</p> <p>8 MS. SHIN: Objection to form.</p> <p>9 A. I don't know.</p> <p>10 Q. Did you turn your computer over to</p> <p>11 your attorney?</p> <p>12 MS. SHIN: Objection to form.</p> <p>13 THE WITNESS: Am I supposed to</p> <p>14 answer?</p> <p>15 MS. SHIN: If you understand</p> <p>16 the question.</p> <p>17 A. I don't understand what's being</p> <p>18 asked.</p> <p>19 Q. What kind of computers do you</p> <p>20 maintain?</p> <p>21 MS. SHIN: Objection to form.</p> <p>22 A. I have an iPad, I have phones, I had</p> <p>23 Samsung phones. I don't know what kind of</p> <p>24 laptop I have.</p> <p>25 Q. Has your laptop been searched for</p>
<p style="text-align: right;">Page 55</p> <p>1 Robyn Abraham</p> <p>2 MS. SHIN: If you could just</p> <p>3 rephrase that question so it doesn't</p> <p>4 sound like whatever her answer is</p> <p>5 might be privileged.</p> <p>6 Q. Have you searched your computer for</p> <p>7 electronic versions of the e-mail that's been</p> <p>8 marked as Abraham Exhibit 2?</p> <p>9 A. I haven't, no.</p> <p>10 Q. Do you believe that you produced to</p> <p>11 your counsel all e-mails in e-mail format</p> <p>12 that have to do with this action?</p> <p>13 A. I've produced everything to both</p> <p>14 British and American counsel.</p> <p>15 Q. Have third parties searched your</p> <p>16 computer for electronic data related to this</p> <p>17 action?</p> <p>18 MS. SHIN: Objection to form.</p> <p>19 A. I don't know.</p> <p>20 Q. How did your attorney receive -- how</p> <p>21 did your attorney receive the documents that</p> <p>22 you produced in this action?</p> <p>23 MS. SHIN: Objection to form.</p> <p>24 A. I provided my attorneys with</p> <p>25 whatever they requested.</p>	<p style="text-align: right;">Page 57</p> <p>1 Robyn Abraham</p> <p>2 documents in connection with this action?</p> <p>3 MS. SHIN: Objection to form.</p> <p>4 A. I don't know.</p> <p>5 Q. Did you provide that laptop to your</p> <p>6 attorneys in this action?</p> <p>7 A. Yes.</p> <p>8 Q. And did you provide your iPad to the</p> <p>9 attorneys -- to your attorneys in this</p> <p>10 action?</p> <p>11 A. No.</p> <p>12 Q. And did you provide your phone to</p> <p>13 the attorneys in this action?</p> <p>14 A. Yes.</p> <p>15 Q. Is the laptop that you provided to</p> <p>16 your attorneys -- strike that.</p> <p>17 How long have you had the laptop</p> <p>18 that you provided to your attorneys in this</p> <p>19 action?</p> <p>20 A. About a year.</p> <p>21 Q. And prior to that, did you have</p> <p>22 another laptop?</p> <p>23 A. Yes.</p> <p>24 Q. And what happened to that laptop?</p> <p>25 A. It crashed.</p>

<p style="text-align: right;">Page 58</p> <p>1 Robyn Abraham</p> <p>2 Q. When you say it crashed, can you</p> <p>3 tell me what you mean by that?</p> <p>4 A. Well, somebody slammed it in an</p> <p>5 overhead bin and that was pretty much the end</p> <p>6 of it.</p> <p>7 Q. And that was on an airplane?</p> <p>8 A. Yes.</p> <p>9 Q. Did you make a claim in connection</p> <p>10 with that?</p> <p>11 MS. SHIN: Objection to form.</p> <p>12 A. Did I make a claim? No. Well, I</p> <p>13 might have. I think it was American -- I</p> <p>14 might have. I don't remember.</p> <p>15 MR. LAFAYETTE: I'm going to</p> <p>16 call for production of any claim that</p> <p>17 she may have filed with American in</p> <p>18 connection with that incident.</p> <p>19 MS. SHIN: We will take it</p> <p>20 under advisement.</p> <p>21 Q. And since -- what kind of laptop was</p> <p>22 it that --</p> <p>23 A. I don't know. All I know is, it was</p> <p>24 white.</p> <p>25 Q. And when did this incident happen</p>	<p style="text-align: right;">Page 60</p> <p>1 Robyn Abraham</p> <p>2 current laptop that you have now, you've had</p> <p>3 for a year?</p> <p>4 A. About that. I don't know exactly,</p> <p>5 but somewhere around that.</p> <p>6 Q. And the -- between the time --</p> <p>7 between the time that your laptop got crushed</p> <p>8 on American Airlines and one year ago, did</p> <p>9 you have another laptop?</p> <p>10 A. No. I used an iPad.</p> <p>11 Q. And for how long did you use an</p> <p>12 iPad?</p> <p>13 A. On and off when I needed it.</p> <p>14 Q. And do you recall from what years</p> <p>15 you used this iPad?</p> <p>16 A. I don't remember.</p> <p>17 Q. Did you use -- did you have the iPad</p> <p>18 in 2013?</p> <p>19 A. I don't think so.</p> <p>20 Q. Did you have an iPad in 2014?</p> <p>21 A. I don't exactly remember.</p> <p>22 Q. Did you begin using the iPad after</p> <p>23 your laptop got crushed on American Airlines?</p> <p>24 A. Yes.</p> <p>25 Q. And do you know approximately for</p>
<p style="text-align: right;">Page 59</p> <p>1 Robyn Abraham</p> <p>2 with American Airlines?</p> <p>3 A. I don't remember.</p> <p>4 Q. Do you know approximately?</p> <p>5 A. No.</p> <p>6 Q. Was it after 2013?</p> <p>7 A. Oh, yes.</p> <p>8 Q. And did you use any other laptop</p> <p>9 between 2013 and 2016?</p> <p>10 A. No.</p> <p>11 Q. After 2013, did you use a desktop</p> <p>12 computer?</p> <p>13 A. No.</p> <p>14 Q. Do you know if this incident</p> <p>15 involving your laptop getting crushed on</p> <p>16 American Airlines occurred after you provided</p> <p>17 documents to Schillings?</p> <p>18 A. I don't know exactly what the timing</p> <p>19 was. I think it was sometime after Mitch</p> <p>20 died, but that's the best I can recall.</p> <p>21 Q. If you provided documents to</p> <p>22 Schillings, would it have been through that</p> <p>23 particular laptop?</p> <p>24 A. I don't recall.</p> <p>25 Q. And the -- you stated that the</p>	<p style="text-align: right;">Page 61</p> <p>1 Robyn Abraham</p> <p>2 how many years you went without a laptop</p> <p>3 computer?</p> <p>4 A. Well, you can use the iPad as a</p> <p>5 computer. So it worked fine. I don't know</p> <p>6 how many years. Two or three.</p> <p>7 Q. Did you have one iPad or did you</p> <p>8 have several iPads?</p> <p>9 A. Just one.</p> <p>10 Q. And did you have this iPad searched</p> <p>11 by your attorneys?</p> <p>12 A. No.</p> <p>13 Q. Ms. Abraham, were your attorneys</p> <p>14 aware that your laptop got crushed --</p> <p>15 A. Yes.</p> <p>16 Q. -- on the American Airlines flight?</p> <p>17 A. Yes.</p> <p>18 Q. And taking a look at what's been</p> <p>19 marked as Abraham Exhibit 2, do you believe</p> <p>20 this is an authentic e-mail?</p> <p>21 A. I recall the contents, and I do</p> <p>22 believe it is authentic, yes.</p> <p>23 Q. And this is not a document that you</p> <p>24 typed?</p> <p>25 A. No.</p>

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62 to 65

<p style="text-align: right;">Page 62</p> <p>1 Robyn Abraham</p> <p>2 Q. And is this a document that you</p> <p>3 altered in any way?</p> <p>4 A. No.</p> <p>5 Q. Do you recall at any time printing</p> <p>6 out e-mails?</p> <p>7 A. No.</p> <p>8 Q. And let me caveat that. That had to</p> <p>9 do with this action.</p> <p>10 A. No.</p> <p>11 Q. Do you know if anybody else printed</p> <p>12 out e-mails having to do with this action for</p> <p>13 you?</p> <p>14 A. I may have asked Marlene to save all</p> <p>15 the documents in a file, because I was</p> <p>16 concerned after Mitch died. But I don't</p> <p>17 know, I can't recall exactly.</p> <p>18 Q. And why were you concerned after</p> <p>19 Mitch died?</p> <p>20 A. Why was I concerned after Mitch</p> <p>21 died? Because he died. When a principal in</p> <p>22 a contract dies, it's concerning.</p> <p>23 Q. And so simply because he died, you</p> <p>24 decided to have Ms. Rue folder e-mails?</p> <p>25 MS. SHIN: Objection to form.</p>	<p style="text-align: right;">Page 64</p> <p>1 Robyn Abraham</p> <p>2 VIDEOGRAPHER: The time is</p> <p>3 11:09 a.m. and we're back on the</p> <p>4 record.</p> <p>5 BY MR. LAFAYETTE:</p> <p>6 Q. Ms. Abraham, did Ms. Rue have access</p> <p>7 to your computer?</p> <p>8 MS. SHIN: Objection to form.</p> <p>9 A. I don't think so.</p> <p>10 Q. Did she have access to your laptop</p> <p>11 computer at the time she worked for you?</p> <p>12 A. No.</p> <p>13 MS. SHIN: Objection. Can I</p> <p>14 just, if it's okay, do you mean to</p> <p>15 say computer? Or account?</p> <p>16 MR. LAFAYETTE: The laptop.</p> <p>17 The physical laptop.</p> <p>18 MS. SHIN: Okay.</p> <p>19 Q. Did Ms. Rue have access to your</p> <p>20 e-mail account?</p> <p>21 A. Not that I'm aware of.</p> <p>22 Q. Can you tell me how it was that she</p> <p>23 would save your e-mails?</p> <p>24 A. I may have printed them out to give</p> <p>25 to her and just to hold on to.</p>
<p style="text-align: right;">Page 63</p> <p>1 Robyn Abraham</p> <p>2 A. I don't know what -- I don't know</p> <p>3 what the question is.</p> <p>4 Q. Okay. You testified that you may</p> <p>5 have asked Marlene to save the e-mails</p> <p>6 because you were concerned after Mitch died.</p> <p>7 Was it solely because he died or was there</p> <p>8 any other concern that you had?</p> <p>9 A. I, in the ordinary course of</p> <p>10 business, I tried to save important</p> <p>11 documents. So I asked her to just save the</p> <p>12 documents. I don't know if she printed them</p> <p>13 or she didn't. I don't remember.</p> <p>14 Q. Did you ask her to do that in</p> <p>15 writing?</p> <p>16 A. No.</p> <p>17 MS. SHIN: Whenever is</p> <p>18 convenient for you, can we take a</p> <p>19 five-minute bathroom break?</p> <p>20 MR. LAFAYETTE: Sure. We could</p> <p>21 do it right now.</p> <p>22 VIDEOGRAPHER: The time is</p> <p>23 10:58 a.m. and we are off the record.</p> <p>24 (Whereupon, a brief recess was</p> <p>25 taken.)</p>	<p style="text-align: right;">Page 65</p> <p>1 Robyn Abraham</p> <p>2 Q. Is that the best of your</p> <p>3 recollection?</p> <p>4 A. To the best of my recollection, I</p> <p>5 think so. It's been a number of years ago,</p> <p>6 so I'm giving you the best of my</p> <p>7 recollection.</p> <p>8 Q. Did you use Microsoft Outlook?</p> <p>9 A. No.</p> <p>10 Q. What type of e-mail system did you</p> <p>11 use?</p> <p>12 A. Just Go Daddy, and gmail.</p> <p>13 Q. If you could take a look at what we</p> <p>14 marked as Abraham Exhibit 1. And if you look</p> <p>15 at the second page of that document, in the</p> <p>16 second to the last paragraph of your April</p> <p>17 30th, 4:25 p.m. e-mail, you state, Also, as a</p> <p>18 U.S., U.K. attorney solicitor deal maker, it</p> <p>19 would be helpful to know whether you own all</p> <p>20 the rights to MOLM or whether the composer</p> <p>21 and lyricist and/or their respective estates</p> <p>22 need to be contacted and coordinated.</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. Did Ms. Wasserman ever respond to</p>

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106 to 109

<p style="text-align: right;">Page 106</p> <p>1 Robyn Abraham</p> <p>2 12, 2013 at 3:46 p.m.?</p> <p>3 A. Yes, but I don't have Mountain Time.</p> <p>4 I never use Mountain Time. So that must be</p> <p>5 her timestamp, not mine.</p> <p>6 Q. Okay. And do you recognize this as</p> <p>7 an e-mail you received from Martha Wasserman,</p> <p>8 I'm sorry, as an e-mail that you sent to</p> <p>9 Martha Wasserman?</p> <p>10 A. It looks familiar.</p> <p>11 Q. And in this e-mail, you request that</p> <p>12 Martha Wasserman send you website information</p> <p>13 regarding the New York Times cruise, correct?</p> <p>14 MS. SHIN: Objection to form.</p> <p>15 A. What's the question?</p> <p>16 MR. LAFAYETTE: I'll ask the</p> <p>17 court reporter to read it back.</p> <p>18 (Whereupon, at this time, the requested</p> <p>19 portion was read by the reporter.)</p> <p>20 A. Well, she called me about it and all</p> <p>21 she gave me was a handout or she sent me a</p> <p>22 handout or something, so I did ask her for</p> <p>23 details on the invitation she extended.</p> <p>24 MR. LAFAYETTE: I'm going to</p> <p>25 mark as Abraham Exhibit 14 a document</p>	<p style="text-align: right;">Page 108</p> <p>1 Robyn Abraham</p> <p>2 Q. Ms. Abraham, is this a true and</p> <p>3 correct copy of an e-mail that you received</p> <p>4 from Martha Wasserman?</p> <p>5 A. I believe so, yes.</p> <p>6 Q. And is this an authentic e-mail?</p> <p>7 A. Yes. I believe so. It looks</p> <p>8 familiar.</p> <p>9 Q. Did you create this document?</p> <p>10 A. No.</p> <p>11 Q. Did anybody else, to your knowledge,</p> <p>12 create this document?</p> <p>13 A. I believe it's authentic.</p> <p>14 Q. Looking -- again, just for the</p> <p>15 record, this was an e-mail that was produced</p> <p>16 without a corresponding e-mail type document.</p> <p>17 Is this a document that you printed</p> <p>18 out for your attorneys?</p> <p>19 A. I believe so.</p> <p>20 Q. And do you recall what computer you</p> <p>21 used to print this out?</p> <p>22 A. Whatever I had at the time. I don't</p> <p>23 recall what computer it was.</p> <p>24 Q. Was it the laptop that got crushed</p> <p>25 on American Airlines?</p>
<p style="text-align: right;">Page 107</p> <p>1 Robyn Abraham</p> <p>2 bearing Bates stamp 0000091.</p> <p>3 (Whereupon, at this time, the</p> <p>4 reporter marked the above-mentioned</p> <p>5 e-mail as Abraham Exhibit 14 for</p> <p>6 identification.)</p> <p>7 BY MR. LAFAYETTE:</p> <p>8 Q. Ms. Abraham, on the first page of</p> <p>9 the document, is this an e-mail that you sent</p> <p>10 to Ms. Wasserman?</p> <p>11 A. It looks familiar, following up on a</p> <p>12 phone conversation that she asked me if I got</p> <p>13 the information for the cruise.</p> <p>14 Q. And on the second page of the</p> <p>15 document, is this an e-mail that you received</p> <p>16 from Martha Wasserman?</p> <p>17 A. It appears to be.</p> <p>18 MR. LAFAYETTE: I'm going to</p> <p>19 mark as Abraham Exhibit 15 a document</p> <p>20 that bears Bates stamps ABR 000576.</p> <p>21 (Whereupon, at this time, the</p> <p>22 reporter marked the above-mentioned</p> <p>23 e-mail as Abraham Exhibit 15 for</p> <p>24 identification.)</p> <p>25 BY MR. LAFAYETTE:</p>	<p style="text-align: right;">Page 109</p> <p>1 Robyn Abraham</p> <p>2 A. I don't -- I don't remember which</p> <p>3 laptop it was.</p> <p>4 Q. Well, do you remember when it was</p> <p>5 that you provided the e-mails to your</p> <p>6 attorney?</p> <p>7 A. Well, these were provided to my</p> <p>8 attorneys in London probably sometime in</p> <p>9 summer of 2014.</p> <p>10 Q. And what laptop did you have at that</p> <p>11 time?</p> <p>12 A. I believe it was the white laptop</p> <p>13 that I had.</p> <p>14 Q. That's the one that got crushed on</p> <p>15 American Airlines, correct?</p> <p>16 A. The one I don't have anymore.</p> <p>17 Q. Well, you testified that it got</p> <p>18 crushed on American Airlines, correct?</p> <p>19 A. Well, somebody slammed the overhead</p> <p>20 on it and it was broken.</p> <p>21 Q. Can you tell me what you did with</p> <p>22 that broken laptop?</p> <p>23 A. Yes. I gave it to my computer</p> <p>24 expert who tried to pull the data off of it,</p> <p>25 and he said he was not successful.</p>

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110 to 113

<p style="text-align: right;">Page 110</p> <p>1 Robyn Abraham</p> <p>2 Q. Okay. Who is your computer expert?</p> <p>3 A. Steve Bardfield.</p> <p>4 Q. What is his name?</p> <p>5 A. Steve Bardfield.</p> <p>6 Q. And where does Mr. Bardfield live?</p> <p>7 A. He lives in Studio City, California.</p> <p>8 Q. And how do you spell his name?</p> <p>9 A. B-A-R-D-F-I-E-L-D.</p> <p>10 Q. And do you have an address and</p> <p>11 telephone number for Mr. Bardfield?</p> <p>12 A. I don't have his address. I believe</p> <p>13 he's publically listed. I don't know it off</p> <p>14 the top of my head.</p> <p>15 Q. What does he do for a living?</p> <p>16 A. He's a computer expert for I don't</p> <p>17 know what company. But he works for them</p> <p>18 full time and then does laptop work for</p> <p>19 individuals on an as-needed basis.</p> <p>20 Q. Okay. Can you provide his telephone</p> <p>21 number to Ms. Shin?</p> <p>22 A. My counsel has it.</p> <p>23 Q. And who has possession of the</p> <p>24 laptop?</p> <p>25 A. He took it.</p>	<p style="text-align: right;">Page 112</p> <p>1 Robyn Abraham</p> <p>2 A. Yes.</p> <p>3 Q. And do you see that they both have</p> <p>4 the same subject?</p> <p>5 A. Yes.</p> <p>6 Q. And do you see that they're</p> <p>7 apparently two minutes apart?</p> <p>8 A. I see what they say, yes.</p> <p>9 MR. LAFAYETTE: I'm going to</p> <p>10 mark as Abraham Exhibit 16 a document</p> <p>11 that bears Bates stamps ABR 003104</p> <p>12 and ABR 003 -- I'm sorry, let me</p> <p>13 start off, it's a document that bears</p> <p>14 Bates stamps ABR 003104 through ABR</p> <p>15 003107.</p> <p>16 (Whereupon, at this time, the</p> <p>17 reporter marked the above-mentioned</p> <p>18 e-mail as Abraham Exhibit 16 for</p> <p>19 identification.)</p> <p>20 MS. SHIN: 16?</p> <p>21 MR. LAFAYETTE: Yes.</p> <p>22 BY MR. LAFAYETTE:</p> <p>23 Q. Ms. Abraham, do you recognize what's</p> <p>24 been marked as Abraham Exhibit 16?</p> <p>25 A. I remember this e-mail, yes.</p>
<p style="text-align: right;">Page 111</p> <p>1 Robyn Abraham</p> <p>2 Q. Does he still have it?</p> <p>3 A. I don't know.</p> <p>4 Q. Have you asked him for it?</p> <p>5 A. Well, he said he used it for parts.</p> <p>6 Q. And when did he tell you that?</p> <p>7 A. After he took it. He said, Do I</p> <p>8 have a problem with it, I said, No. He said,</p> <p>9 It's dead, you can't use it anyway.</p> <p>10 Q. Have you contacted him since the</p> <p>11 commencement of this litigation to see if he</p> <p>12 still maintains the laptop?</p> <p>13 A. Yes.</p> <p>14 Q. And what did he say?</p> <p>15 A. He said it's gone.</p> <p>16 MR. LAFAYETTE: I'm going to</p> <p>17 call for production of his telephone</p> <p>18 number.</p> <p>19 MS. SHIN: We will take it</p> <p>20 under advisement.</p> <p>21 Q. And taking a look at what we've</p> <p>22 marked now as Abraham Exhibit 15, and the</p> <p>23 second page of what's been marked as Abraham</p> <p>24 Exhibit 14, do you see that both of those</p> <p>25 e-mails say, Dear Abraham?</p>	<p style="text-align: right;">Page 113</p> <p>1 Robyn Abraham</p> <p>2 Q. And do you know why there are three</p> <p>3 blank pages that follow the cover page of</p> <p>4 this e-mail?</p> <p>5 A. I don't know.</p> <p>6 Q. Is this an authentic e-mail?</p> <p>7 A. I recall receiving this, and sending</p> <p>8 it to counsel. So to the best of my</p> <p>9 knowledge, yes.</p> <p>10 Q. Just going back to what's been</p> <p>11 marked as Abraham Exhibit 15, do you believe</p> <p>12 that to be an authentic e-mail?</p> <p>13 A. I recognize it, and it looks</p> <p>14 familiar. So I do believe that to be</p> <p>15 authentic.</p> <p>16 Q. Did you create this e-mail?</p> <p>17 A. No.</p> <p>18 Q. Do you know if anybody else created</p> <p>19 this e-mail, other than Ms. Wasserman?</p> <p>20 A. I was going to say, I believe Ms.</p> <p>21 Wasserman created this e-mail.</p> <p>22 MR. LAFAYETTE: I'm going to</p> <p>23 mark as Abraham Exhibit 17 a document</p> <p>24 bearing Bates stamps ABR 001160</p> <p>25 through ABR 001161.</p>

<p style="text-align: right;">Page 118</p> <p>1 Robyn Abraham</p> <p>2 however many versions later.</p> <p>3 MR. LAFAYETTE: I'm going to</p> <p>4 mark as Abraham Exhibit 19, a</p> <p>5 document bearing Bates stamp ABR</p> <p>6 000577.</p> <p>7 (Whereupon, at this time, the</p> <p>8 reporter marked the above-mentioned</p> <p>9 e-mail as Abraham Exhibit 19 for</p> <p>10 identification.)</p> <p>11 BY MR. LAFAYETTE:</p> <p>12 Q. Ms. Abraham, is this an e-mail you</p> <p>13 received from Martha Wasserman?</p> <p>14 A. I remember receiving something like</p> <p>15 this after receiving something very different</p> <p>16 like within a short period of time. Because</p> <p>17 this one is copied to Nan Bases and she</p> <p>18 called and told me that Nan Bases had yelled</p> <p>19 at her. So she had to write an e-mail asking</p> <p>20 for the hundred thousand up front. Because</p> <p>21 she was in trouble with Nan and she didn't</p> <p>22 want to get in trouble with Nan. So I do</p> <p>23 remember this e-mail.</p> <p>24 Q. And is this a true and correct copy</p> <p>25 of the e-mail that you received?</p>	<p style="text-align: right;">Page 120</p> <p>1 Robyn Abraham</p> <p>2 Q. I'm asking if you see that in the</p> <p>3 e-mail.</p> <p>4 A. The e-mail says what it says.</p> <p>5 Q. Do you see that in the e-mail?</p> <p>6 A. Yes. I see this.</p> <p>7 Q. Okay. And who is Helen?</p> <p>8 A. Well --</p> <p>9 Q. If you know?</p> <p>10 A. I didn't write this e-mail. So you</p> <p>11 would have to ask your client.</p> <p>12 Q. Did you know who Ms. Wasserman was</p> <p>13 referring to by Helen?</p> <p>14 A. I'm assuming she had met Helen</p> <p>15 Darion although she told me she was</p> <p>16 incompetent in a few prior phone calls. So</p> <p>17 I'm assuming she meant Helen Darion, I didn't</p> <p>18 know of another Helen.</p> <p>19 Q. When did she tell you that</p> <p>20 Ms. Darion was incompetent?</p> <p>21 A. Oh, fairly on, around -- probably</p> <p>22 around late summer, early fall of 2013.</p> <p>23 Q. And this was in a phone</p> <p>24 conversation?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 119</p> <p>1 Robyn Abraham</p> <p>2 A. I don't know. I mean, let's put it</p> <p>3 this way. It looks familiar, but I do</p> <p>4 remember her asking me for one thing and</p> <p>5 sending me one set of e-mails and then</p> <p>6 sending me something completely different</p> <p>7 like within a very short period of time. And</p> <p>8 my calling her and going, What? So she said,</p> <p>9 well, Nan was yelling at her and she had to</p> <p>10 ask for the money upfront.</p> <p>11 Q. And when you say had to ask for the</p> <p>12 money up front, are you referring to anything</p> <p>13 in this e-mail?</p> <p>14 A. Yes. She's putting in this e-mail</p> <p>15 her hundred thousand nonrefundable advance --</p> <p>16 oh, I didn't even know she had the calculated</p> <p>17 potential of revenue per week, that part I</p> <p>18 don't recall, but, yeah, that was a complete</p> <p>19 turnaround from what was happening</p> <p>20 previously.</p> <p>21 Q. And moreover in this e-mail she</p> <p>22 makes reference to pursuing the MOLM proposal</p> <p>23 and doing business with Mitch and Helen.</p> <p>24 Do you see that?</p> <p>25 A. Is there a question?</p>	<p style="text-align: right;">Page 121</p> <p>1 Robyn Abraham</p> <p>2 Q. And did anyone overhear your phone</p> <p>3 conversation, to your knowledge?</p> <p>4 A. Not that I am aware of. She also</p> <p>5 repeated that to me when we went to lunch. I</p> <p>6 don't remember which lunch. But she said</p> <p>7 that Helen had owned a very expensive</p> <p>8 apartment in New York and it was dilapidated,</p> <p>9 and it was a pity because Helen was unable to</p> <p>10 care for herself. And she went on and on</p> <p>11 about Helen and explained that that's why</p> <p>12 Mitch controlled Helen's rights, and that</p> <p>13 part I very clearly remember. So this was</p> <p>14 like what I got after Nan Bases reportedly</p> <p>15 yelled at Martha. And then Martha invited me</p> <p>16 back on the cruise anyway.</p> <p>17 Q. After you received the e-mail that's</p> <p>18 been marked as Abraham Exhibit 19, did you</p> <p>19 continue to contact -- strike that.</p> <p>20 After you received the e-mail that's</p> <p>21 been marked as Abraham Exhibit 19, did you</p> <p>22 continue to communicate with Ms. Wasserman?</p> <p>23 MS. SHIN: Objection to form.</p> <p>24 THE WITNESS: Do I answer?</p> <p>25 MS. SHIN: Yes.</p>

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<p style="text-align: right;">Page 122</p> <p>1 Robyn Abraham</p> <p>2 A. She continued to call me.</p> <p>3 Q. And did you communicate to her when</p> <p>4 she called you?</p> <p>5 A. I'm sorry?</p> <p>6 Q. Did you communicate with her when</p> <p>7 she called you?</p> <p>8 A. Well, I answered the phone.</p> <p>9 Q. And did you speak to her?</p> <p>10 A. Well, she called me, so, yes, I said</p> <p>11 hello, and I did ask her, I said, Do you want</p> <p>12 to get Nan on the phone. She said, no, Nan</p> <p>13 yells at her.</p> <p>14 Q. And so, therefore, you continued to</p> <p>15 communicate directly with Ms. Wasserman,</p> <p>16 correct?</p> <p>17 A. I wasn't acting as her attorney. I</p> <p>18 was acting in a way that she had asked me to</p> <p>19 go to Mitch for whatever it is Martha wanted</p> <p>20 that day. So I was like, Martha, do you want</p> <p>21 to get Nan on the phone, no, she'll yell at</p> <p>22 me.</p> <p>23 Q. And as of that date, did you know</p> <p>24 that Ms. Wasserman was represented by an</p> <p>25 attorney?</p>	<p style="text-align: right;">Page 124</p> <p>1 Robyn Abraham</p> <p>2 A. I don't know if it was my response,</p> <p>3 but the e-mail looks familiar.</p> <p>4 Q. Let me just go back to Exhibit 19</p> <p>5 for a moment.</p> <p>6 Is Exhibit 19 an authentic e-mail?</p> <p>7 MS. SHIN: Objection to form.</p> <p>8 A. It appears to be. It's from your</p> <p>9 client.</p> <p>10 Q. And did you do anything to alter</p> <p>11 this e-mail from Ms. Wasserman that's been</p> <p>12 marked as Exhibit 19?</p> <p>13 A. No.</p> <p>14 Q. And this e-mail was not produced in</p> <p>15 e-mail format. Is this one of the documents</p> <p>16 that you gave your attorneys --</p> <p>17 MS. SHIN: Objection. I'm</p> <p>18 going to object to your</p> <p>19 representation. I don't think that's</p> <p>20 accurate. But I just wanted to put</p> <p>21 that on the record.</p> <p>22 MR. LAFAYETTE: Okay.</p> <p>23 A. I'm sorry, what is the question?</p> <p>24 Q. My question was, is this one of the</p> <p>25 e-mails that you provided to Schillings in</p>
<p style="text-align: right;">Page 123</p> <p>1 Robyn Abraham</p> <p>2 MS. SHIN: Objection to form.</p> <p>3 What day?</p> <p>4 Q. As of the day of the e-mail,</p> <p>5 September 20, 2013.</p> <p>6 A. I don't remember what day she called</p> <p>7 me. She called me fairly regularly. So I</p> <p>8 mean, I saw the e-mail. The e-mail says what</p> <p>9 it says. So I believe I've answered the</p> <p>10 question.</p> <p>11 MS. SHIN: Can we take a</p> <p>12 five-minute break, whenever you're</p> <p>13 ready?</p> <p>14 MR. LAFAYETTE: Very soon.</p> <p>15 I will mark as Abraham Exhibit</p> <p>16 20 a document that bears Bates stamp</p> <p>17 ABR 003108.</p> <p>18 (Whereupon, at this time, the</p> <p>19 reporter marked the above-mentioned</p> <p>20 e-mail as Abraham Exhibit 20 for</p> <p>21 identification.)</p> <p>22 BY MR. LAFAYETTE:</p> <p>23 Q. Is what's been marked as Abraham</p> <p>24 Exhibit 20 your response to what's been</p> <p>25 marked as Abraham Exhibit 19?</p>	<p style="text-align: right;">Page 125</p> <p>1 Robyn Abraham</p> <p>2 2014?</p> <p>3 A. Which exhibit are you talking about?</p> <p>4 Q. Exhibit 19.</p> <p>5 A. This appears to be a true and</p> <p>6 correct e-mail from Martha.</p> <p>7 Q. And is this one of the e-mails that</p> <p>8 you provided to your attorneys?</p> <p>9 A. Yes. I provided them with</p> <p>10 everything I had.</p> <p>11 Q. And did you print out this e-mail?</p> <p>12 A. I believe so.</p> <p>13 Q. In the document that we've marked as</p> <p>14 Exhibit 20, you state that you cannot</p> <p>15 directly contact Mitch given your</p> <p>16 longstanding excellent relationship with</p> <p>17 senior members of ASCAP.</p> <p>18 Do you see that?</p> <p>19 A. Are you on the second to bottom</p> <p>20 paragraph?</p> <p>21 Q. Yes.</p> <p>22 A. Yes, I see it.</p> <p>23 Q. Could you explain why you were</p> <p>24 prohibited from contacting Mitch?</p> <p>25 A. I don't recall.</p>

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<p style="text-align: right;">Page 126</p> <p>1 Robyn Abraham</p> <p>2 Q. And in the last line, you say, Of</p> <p>3 course, this request expeditiously was</p> <p>4 approved as well. What were you referring</p> <p>5 to?</p> <p>6 A. I can't recall. I don't -- I don't</p> <p>7 know what this request expeditiously was</p> <p>8 approved as well means.</p> <p>9 Q. And did you speak to Nan Bases after</p> <p>10 sending this e-mail?</p> <p>11 MS. SHIN: Objection to form.</p> <p>12 A. I don't recall. I know I've spoken</p> <p>13 with Nan, but I don't remember the timing of</p> <p>14 when I spoke with Nan.</p> <p>15 MR. LAFAYETTE: I'm going to</p> <p>16 mark as Abraham Exhibit 21 a document</p> <p>17 bearing Bates stamps W 0000431.</p> <p>18 MS. SHIN: Before we go into</p> <p>19 that document, it's 1:09. So I don't</p> <p>20 know, I mean, I can run and do the</p> <p>21 ladies' room real quick if you want</p> <p>22 to continue and we'll come right</p> <p>23 back.</p> <p>24 MR. LAFAYETTE: Okay. Let's do</p> <p>25 that because I just want to finish an</p>	<p style="text-align: right;">Page 128</p> <p>1 Robyn Abraham</p> <p>2 notice that Exhibit 19 does not have the P.S.</p> <p>3 that Exhibit 21 has on the second page?</p> <p>4 Do you notice that?</p> <p>5 A. No, I just figured there was a page</p> <p>6 missing on this. I don't -- I mean, if you</p> <p>7 point it out, I see what you're saying. But</p> <p>8 I just figured this continued to another</p> <p>9 page.</p> <p>10 Q. So your speculation is that there's</p> <p>11 another page that follows ABR 000577 that</p> <p>12 would have that P.S. on it?</p> <p>13 MS. SHIN: Objection to form.</p> <p>14 A. I don't know.</p> <p>15 Q. Do you know -- do you have any</p> <p>16 understanding why what's been marked as</p> <p>17 Abraham Exhibit 19 is missing the P.S.?</p> <p>18 A. I don't know if it is. I just don't</p> <p>19 see it on here. But it may have continued to</p> <p>20 another page. I don't know.</p> <p>21 Q. Did you edit the document that was</p> <p>22 marked as Exhibit 19?</p> <p>23 A. No.</p> <p>24 Q. Do you know if anybody else did?</p> <p>25 A. No. I just figure it got cut off</p>
<p style="text-align: right;">Page 127</p> <p>1 Robyn Abraham</p> <p>2 area and then we will go to lunch.</p> <p>3 MS. SHIN: How much longer</p> <p>4 after I come back?</p> <p>5 MR. LAFAYETTE: Maybe 15</p> <p>6 minutes.</p> <p>7 VIDEOGRAPHER: The time is 1:09</p> <p>8 p.m. and we are off the record.</p> <p>9 (Whereupon, a brief recess was</p> <p>10 taken.)</p> <p>11 VIDEOGRAPHER: The time is 1:15</p> <p>12 p.m. and we're back on the record.</p> <p>13 MR. LAFAYETTE: I'm going to</p> <p>14 mark a different document as Abraham</p> <p>15 Exhibit 21. It bears Bates stamps</p> <p>16 ABR 001163, and ABR 001164.</p> <p>17 (Whereupon, at this time, the</p> <p>18 reporter marked the above-mentioned</p> <p>19 e-mail as Abraham Exhibit 21 for</p> <p>20 identification.)</p> <p>21 BY MR. LAFAYETTE:</p> <p>22 Q. Ms. Abraham, if you will look at the</p> <p>23 page that's ABR 001164, and the document that</p> <p>24 we previously marked as Abraham Exhibit 19,</p> <p>25 you will notice that exhibit -- you will</p>	<p style="text-align: right;">Page 129</p> <p>1 Robyn Abraham</p> <p>2 somewhere.</p> <p>3 Q. But do you know that?</p> <p>4 A. I don't know it. I'm not an IT</p> <p>5 person.</p> <p>6 Q. So you're speculating?</p> <p>7 A. I don't know.</p> <p>8 MS. SHIN: Objection to form.</p> <p>9 MR. LAFAYETTE: I'm going to</p> <p>10 mark as Abraham Exhibit 22 a document</p> <p>11 bearing Bates stamps ABR 003109.</p> <p>12 (Whereupon, at this time, the</p> <p>13 reporter marked the above-mentioned</p> <p>14 e-mail as Abraham Exhibit 22 for</p> <p>15 identification.)</p> <p>16 BY MR. LAFAYETTE:</p> <p>17 Q. Ms. Abraham, have you taken a look</p> <p>18 at that document?</p> <p>19 A. Yes.</p> <p>20 Q. Is this a copy of an e-mail that you</p> <p>21 sent to Martha Wasserman on September 23,</p> <p>22 2013?</p> <p>23 A. It appears to be, yes.</p> <p>24 Q. And is this an authentic e-mail?</p> <p>25 A. Yes, to the best of my recollection,</p>

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<p style="text-align: right;">Page 138</p> <p>1 Robyn Abraham</p> <p>2 A. Because she told me she would do</p> <p>3 that if I helped her get this going. And I</p> <p>4 was asking her to do what she said she was</p> <p>5 going to do.</p> <p>6 MR. LAFAYETTE: Okay. Let's</p> <p>7 take a break.</p> <p>8 MS. SHIN: When should we come</p> <p>9 back?</p> <p>10 VIDEOGRAPHER: The time is 1:31</p> <p>11 p.m. and we are off the record.</p> <p>12 (Whereupon, a brief recess was</p> <p>13 taken.)</p> <p>14 VIDEOGRAPHER: The time is 2:28</p> <p>15 p.m. and we are back on the record.</p> <p>16 BY MR. LAFAYETTE:</p> <p>17 Q. I just want to go back to your</p> <p>18 computers and handheld devices for a second.</p> <p>19 What computers do you currently use?</p> <p>20 A. I've got -- are you talking hand</p> <p>21 held? I've got an iPhone, I've got an iPad,</p> <p>22 and I've got a laptop.</p> <p>23 Q. With respect to the iPad, how long</p> <p>24 have you had that iPad?</p> <p>25 A. Probably four or five years.</p>	<p style="text-align: right;">Page 140</p> <p>1 Robyn Abraham</p> <p>2 about five years.</p> <p>3 Q. Okay. So for what five-year period</p> <p>4 did you have the Samsung?</p> <p>5 A. Both of them. Oh, for the Samsung,</p> <p>6 I probably had it from 2011 until about 2015.</p> <p>7 Q. And for what period of time did you</p> <p>8 have the Edge?</p> <p>9 A. That was from about 2015 to about</p> <p>10 2017 or '18.</p> <p>11 Q. Okay. And with respect to your</p> <p>12 iPad, did you have an iPad prior to the one</p> <p>13 you currently have?</p> <p>14 A. No. It's the old model.</p> <p>15 Q. And with respect to your current</p> <p>16 laptop, how long have you had that?</p> <p>17 A. About a year and a half.</p> <p>18 Q. And during what period of time did</p> <p>19 you have the laptop that you said got crushed</p> <p>20 in the overhead bin?</p> <p>21 A. That one, probably about four years,</p> <p>22 from about 2010 to 2014.</p> <p>23 Q. I'm not sure if I asked you this,</p> <p>24 but did you file any written reports about</p> <p>25 your laptop getting damaged?</p>
<p style="text-align: right;">Page 139</p> <p>1 Robyn Abraham</p> <p>2 Q. And with respect to your phone, how</p> <p>3 long have you had that phone?</p> <p>4 A. This one is new. This one is</p> <p>5 probably about eight months old.</p> <p>6 Q. Okay. And before that phone, did</p> <p>7 you have another phone?</p> <p>8 A. Yes, I had two other phones.</p> <p>9 Q. Two other phones?</p> <p>10 A. Two other phones.</p> <p>11 Q. And what kind of phones were those?</p> <p>12 A. They were Samsungs.</p> <p>13 Q. And where are those phones today?</p> <p>14 A. I gave them to my counsel, who used</p> <p>15 them for whatever. And then she gave them</p> <p>16 back to me.</p> <p>17 Q. And how long did you have those two</p> <p>18 Samsung phones?</p> <p>19 A. Long time. Probably -- well, not</p> <p>20 the -- I had an Edge. The Edge one I had</p> <p>21 only for about two years. And it like melted</p> <p>22 and kind of turned black and smoked and that</p> <p>23 kind of fun stuff. And then the one before</p> <p>24 that, I had a black Samsung which now has a</p> <p>25 short in it, and that one was probably for</p>	<p style="text-align: right;">Page 141</p> <p>1 Robyn Abraham</p> <p>2 A. I may have, but I remember American</p> <p>3 Airlines said that they weren't going to pay</p> <p>4 for it because they didn't do it, it was</p> <p>5 another passenger. They didn't cause the</p> <p>6 problem.</p> <p>7 Q. Did they tell you this in writing?</p> <p>8 A. I don't remember. I don't think --</p> <p>9 I think I submitted something, they have like</p> <p>10 an online thing that you submit. So I</p> <p>11 submitted an online thing. And I don't know</p> <p>12 if I got anything back. But when I didn't, I</p> <p>13 called them.</p> <p>14 Q. And could you describe a little more</p> <p>15 particularly like what caused your laptop to</p> <p>16 get crushed in the overhead bin?</p> <p>17 A. Yes. I had it in a case, like a</p> <p>18 laptop case, just a regular case. And</p> <p>19 somebody was getting on and moving things</p> <p>20 around, and then slammed the top of the</p> <p>21 overhead bin onto it.</p> <p>22 Q. The cover of the overhead bin?</p> <p>23 A. You know how you put things in the</p> <p>24 overhead bin on a plane?</p> <p>25 Q. Yes.</p>

<p style="text-align: right;">Page 142</p> <p>1 Robyn Abraham</p> <p>2 A. They were moving their suitcase in</p> <p>3 and I was on the phone, and they slammed the</p> <p>4 overhead bin onto the laptop.</p> <p>5 Q. And you don't know the person that</p> <p>6 did this, do you, the identity of the person</p> <p>7 that did this?</p> <p>8 A. I don't know who it was, and -- no.</p> <p>9 I didn't know it was broken at the time, it</p> <p>10 was in a case.</p> <p>11 MR. LAFAYETTE: I'm going to</p> <p>12 call for the production of any</p> <p>13 documents concerning this incident</p> <p>14 with American Airlines.</p> <p>15 MS. SHIN: I think you already</p> <p>16 did that, but okay. We will take it</p> <p>17 under advisement.</p> <p>18 Q. And do you have any knowledge of</p> <p>19 when any of the Go Daddy server crashes may</p> <p>20 have occurred?</p> <p>21 A. I gave that to my counsel. I mean,</p> <p>22 it was ongoing from 2012 where there was a</p> <p>23 big one in 2012 and then there were a couple</p> <p>24 of them along the way. So I don't know the</p> <p>25 exact dates, but it's all available -- if you</p>	<p style="text-align: right;">Page 144</p> <p>1 Robyn Abraham</p> <p>2 A. Can you speak up, I'm sorry, I can't</p> <p>3 hear you.</p> <p>4 Q. During the period of time that you</p> <p>5 had the laptop that got crushed in the</p> <p>6 overhead bin, could you explain to me how you</p> <p>7 would access your e-mail?</p> <p>8 A. From the phone, from my phone.</p> <p>9 Q. From your phone, you never accessed</p> <p>10 your e-mail through your laptop computer?</p> <p>11 A. Well, when it was crushed, I</p> <p>12 couldn't.</p> <p>13 Q. Before the time it was crushed I'm</p> <p>14 asking.</p> <p>15 A. Yes. I accessed it through the</p> <p>16 computer, the laptop.</p> <p>17 Q. Could you just describe for me when</p> <p>18 you opened your computer exactly what you</p> <p>19 would do to access your e-mail?</p> <p>20 A. Yes. I would have to go on to like</p> <p>21 Google or Fox server and then hit the button</p> <p>22 for the Go Daddy, and then type in my account</p> <p>23 and the pass code.</p> <p>24 Q. Can you just tell me what the Fox</p> <p>25 server was? I'm not familiar with what that</p>
<p style="text-align: right;">Page 143</p> <p>1 Robyn Abraham</p> <p>2 go Google this online, you can find the same</p> <p>3 thing I did. But when I complained about</p> <p>4 things missing, they sent me coupons.</p> <p>5 Q. And what accounts did you find</p> <p>6 things missing?</p> <p>7 A. Well, when I was working on things</p> <p>8 and didn't see them anymore, it was on the</p> <p>9 global dot TV and it was also on the</p> <p>10 encapsule dot com account. And they were</p> <p>11 both Go Daddy accounts.</p> <p>12 Q. And did you discover that e-mails</p> <p>13 were missing?</p> <p>14 A. Yes.</p> <p>15 Q. Did Go Daddy ever acknowledge that</p> <p>16 any -- did Go Daddy ever acknowledge to you</p> <p>17 that any of their server crashes caused you</p> <p>18 to lose e-mails?</p> <p>19 MS. SHIN: Objection to form.</p> <p>20 A. I don't know how to answer that</p> <p>21 question. They said that there was a problem</p> <p>22 they're working on. That's the best they</p> <p>23 would give me.</p> <p>24 Q. Now, I want to -- during the period</p> <p>25 of time that you had the laptop --</p>	<p style="text-align: right;">Page 145</p> <p>1 Robyn Abraham</p> <p>2 is.</p> <p>3 A. I said there was a link on the like</p> <p>4 Google or Firefox server, and I would hit the</p> <p>5 link and it would show up in a little box,</p> <p>6 and then I would put in my e-mail and my</p> <p>7 password.</p> <p>8 Q. And is that the same for HB Global</p> <p>9 as well as the encapsule e-mail?</p> <p>10 A. They're both the same system but</p> <p>11 they're different passwords. They're both Go</p> <p>12 Daddy accounts, if that answers your</p> <p>13 question.</p> <p>14 Q. Do you currently still use Go Daddy</p> <p>15 for e-mail?</p> <p>16 A. Believe it or not, yes, I do. They</p> <p>17 said just change your password. I've had it</p> <p>18 happen on gmail too, so, like I said --</p> <p>19 MR. LAFAYETTE: Okay. I'm</p> <p>20 going to mark as Abraham Exhibit 23 a</p> <p>21 document that bears the Bates stamp</p> <p>22 ABR 000578.</p> <p>23 (Whereupon, at this time, the</p> <p>24 reporter marked the above-mentioned</p> <p>25 e-mail as Abraham Exhibit 23 for</p>

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<p style="text-align: right;">Page 146</p> <p>1 Robyn Abraham</p> <p>2 identification.)</p> <p>3 BY MR. LAFAYETTE:</p> <p>4 MS. SHIN: What number is this?</p> <p>5 MS. SHYMAN: 23.</p> <p>6 BY MR. LAFAYETTE:</p> <p>7 Q. Is this a true and correct copy of</p> <p>8 an e-mail that you received from Martha</p> <p>9 Wasserman?</p> <p>10 A. To the best of my knowledge, yes.</p> <p>11 Q. And is this document authentic?</p> <p>12 MS. SHIN: Object to form.</p> <p>13 Q. Is this an authentic e-mail?</p> <p>14 A. To the best of my knowledge, yes.</p> <p>15 Q. And did you at any time edit this</p> <p>16 e-mail?</p> <p>17 A. No.</p> <p>18 Q. Do you know if anybody else did?</p> <p>19 A. I thought it came from Martha</p> <p>20 Wasserman, so, no.</p> <p>21 Q. On your laptop that you had in 2013,</p> <p>22 did you have Microsoft Word?</p> <p>23 A. I don't remember what I had. I had</p> <p>24 some kind of Microsoft, I think. It was an</p> <p>25 Android.</p>	<p style="text-align: right;">Page 148</p> <p>1 Robyn Abraham</p> <p>2 Q. The e-mail states that you need to</p> <p>3 raise \$100,000 to even begin to discuss this.</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. Did you ever raise \$100,000 in</p> <p>7 connection with Man of La Mancha?</p> <p>8 A. No.</p> <p>9 Q. Do you know where you were on</p> <p>10 September 23, 2013?</p> <p>11 A. I have no idea. I don't know.</p> <p>12 MR. LAFAYETTE: I'm going to</p> <p>13 mark as Abraham Exhibit 24, a</p> <p>14 document that bears Bates stamp ABR</p> <p>15 001165 and ABR 001166.</p> <p>16 (Whereupon, at this time, the</p> <p>17 reporter marked the above-mentioned</p> <p>18 e-mail as Abraham Exhibit 24 for</p> <p>19 identification.)</p> <p>20 BY MR. LAFAYETTE:</p> <p>21 Q. Is this an e-mail that you received</p> <p>22 from Martha Wasserman?</p> <p>23 A. I believe so.</p> <p>24 Q. In this e-mail, Ms. Wasserman makes</p> <p>25 it clear that with respect to Man of La</p>
<p style="text-align: right;">Page 147</p> <p>1 Robyn Abraham</p> <p>2 Q. Your laptop was an Android?</p> <p>3 A. It was not a, you know, iMac. So</p> <p>4 whatever they put on it is what I had.</p> <p>5 Q. Your laptop was not a Mac?</p> <p>6 A. No, it wasn't a Mac.</p> <p>7 Q. Do you remember what kind of laptop</p> <p>8 it was?</p> <p>9 A. It may have been an IBM. I'm not</p> <p>10 sure.</p> <p>11 Q. Do you have a -- do you know what</p> <p>12 kind of operating system it had?</p> <p>13 A. I'm afraid not, no.</p> <p>14 Q. Did you have Excel on it?</p> <p>15 A. If I did, I didn't know about it.</p> <p>16 Q. Do you know if anybody altered this</p> <p>17 e-mail, to your knowledge?</p> <p>18 A. I'm sorry.</p> <p>19 MS. SHIN: Objection.</p> <p>20 Q. Do you know if anybody altered this</p> <p>21 e-mail, to your knowledge?</p> <p>22 MS. SHIN: Objection to form.</p> <p>23 A. No.</p> <p>24 Q. Referring to Abraham 23.</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 149</p> <p>1 Robyn Abraham</p> <p>2 Mancha, you're proceeding on your own behalf;</p> <p>3 isn't that correct?</p> <p>4 MS. SHIN: Objection to form.</p> <p>5 A. I think it states what it states in</p> <p>6 this e-mail.</p> <p>7 Q. And did you understand that from</p> <p>8 this e-mail?</p> <p>9 MS. SHIN: Objection to form.</p> <p>10 A. Well, this e-mail states what Martha</p> <p>11 states in this e-mail and then Martha would</p> <p>12 call me and say, you know, Nan told her to do</p> <p>13 this. So I was getting mixed signals.</p> <p>14 Q. Did you call Nan or e-mail Nan to</p> <p>15 ask her for an explanation?</p> <p>16 MS. SHIN: Objection to form.</p> <p>17 A. No, I wasn't trying to be Martha's</p> <p>18 lawyer. So I didn't see any reason I had to</p> <p>19 do that.</p> <p>20 Q. But you were a lawyer at this time,</p> <p>21 correct?</p> <p>22 MS. SHIN: Objection to form.</p> <p>23 A. I wasn't trying to be Martha's</p> <p>24 lawyer. And I didn't see a problem. I was</p> <p>25 working with her on something she asked for,</p>

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<p style="text-align: right;">Page 158</p> <p>1 Robyn Abraham</p> <p>2 advised by Ms. Wasserman not to correspond</p> <p>3 with her that you continued to correspond</p> <p>4 with her as demonstrated by this e-mail?</p> <p>5 MS. SHIN: Objection to form.</p> <p>6 THE WITNESS: Should I answer?</p> <p>7 MS. SHIN: Yes. If you</p> <p>8 understood it.</p> <p>9 A. Yes. Because she kept calling me</p> <p>10 and asking me for advice.</p> <p>11 Q. And did she call you between</p> <p>12 September 23, 2013 and October 3, 2013 to ask</p> <p>13 you for advice?</p> <p>14 MS. SHIN: Objection to form.</p> <p>15 A. I don't know the exact dates. But I</p> <p>16 do recall she continued to continue our</p> <p>17 relationship.</p> <p>18 MR. LAFAYETTE: I'm going to</p> <p>19 mark as Abraham Exhibit 27, a</p> <p>20 document that bears Bates stamp ABR</p> <p>21 000579.</p> <p>22 (Whereupon, at this time, the</p> <p>23 reporter marked the above-mentioned</p> <p>24 e-mail as Abraham Exhibit 27 for</p> <p>25 identification.)</p>	<p style="text-align: right;">Page 160</p> <p>1 Robyn Abraham</p> <p>2 Q. In any of those subsequent</p> <p>3 conversations.</p> <p>4 A. Well, that was kind of why she</p> <p>5 wanted me to go on the Christmas cruise. So</p> <p>6 I don't, you know, I spoke with her and</p> <p>7 answered whatever questions she had.</p> <p>8 MR. LAFAYETTE: I'm going to</p> <p>9 mark as Abraham Exhibit 28 an e-mail</p> <p>10 that bears the Bates stamp ABR</p> <p>11 001173. And actually it continues on</p> <p>12 to ABR 001174.</p> <p>13 (Whereupon, at this time, the</p> <p>14 reporter marked the above-mentioned</p> <p>15 e-mail as Abraham Exhibit 28 for</p> <p>16 identification.)</p> <p>17 BY MR. LAFAYETTE:</p> <p>18 Q. Is Abraham Exhibit 28 a true and</p> <p>19 correct copy of the e-mail you received from</p> <p>20 Martha Wasserman?</p> <p>21 A. I suspect so. I don't have a direct</p> <p>22 recollection of this one in particular. But</p> <p>23 I do remember receiving a number of e-mails</p> <p>24 from Martha during these days that were</p> <p>25 contrary when Nan was copied. So --</p>
<p style="text-align: right;">Page 159</p> <p>1 Robyn Abraham</p> <p>2 BY MR. LAFAYETTE:</p> <p>3 Q. Is what's been marked as Abraham</p> <p>4 Exhibit 27 a true and correct copy of an</p> <p>5 e-mail you received from Martha Wasserman?</p> <p>6 A. To the best of my knowledge, yes.</p> <p>7 Q. And did you play any role in</p> <p>8 creating this e-mail?</p> <p>9 A. No.</p> <p>10 Q. Do you know if anyone other than</p> <p>11 Martha Wasserman played any role in creating</p> <p>12 this e-mail?</p> <p>13 A. I do not know.</p> <p>14 Q. After you received this e-mail, did</p> <p>15 you continue to correspond with Ms.</p> <p>16 Wasserman?</p> <p>17 A. I don't know if I corresponded. I</p> <p>18 do know that we continued phone</p> <p>19 conversations, and she had invited me on a</p> <p>20 Christmas cruise. So we probably had</p> <p>21 conversations along those lines.</p> <p>22 Q. And did you discuss the production</p> <p>23 of Man of La Mancha?</p> <p>24 MS. SHIN: Objection to form.</p> <p>25 A. When?</p>	<p style="text-align: right;">Page 161</p> <p>1 Robyn Abraham</p> <p>2 Q. But she does ask you to contact Nan</p> <p>3 Bases, not her, regarding MOLM, correct?</p> <p>4 A. Well, she -- what are you referring</p> <p>5 to? I'm confused.</p> <p>6 Q. In this e-mail she asks you to</p> <p>7 contact Nan Bases if you have any questions</p> <p>8 regarding Man of La Mancha, and not her,</p> <p>9 correct?</p> <p>10 A. I don't see where it says not her.</p> <p>11 Q. Okay. If you take a look at the</p> <p>12 second page, right before the fourth line up</p> <p>13 in the e-mail, it says, As I said in my</p> <p>14 previous e-mail, please, Robyn, contact Nan</p> <p>15 Bases, my New York attorney, if you have any</p> <p>16 questions re MOLM, not me.</p> <p>17 Do you see that?</p> <p>18 A. That's different than what she told</p> <p>19 me in the morning.</p> <p>20 Q. Okay. But do you see this in the</p> <p>21 e-mail?</p> <p>22 A. Yes, I do see.</p> <p>23 Q. Did you comply with this request?</p> <p>24 A. I didn't have any questions, so</p> <p>25 there was no reason to contact Nan Bases.</p>

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<p style="text-align: right;">Page 210</p> <p>1 Robyn Abraham</p> <p>2 asked Lisa to bring it in. I don't remember</p> <p>3 if this was the first meeting or the second</p> <p>4 meeting, and she brought it in. And it said</p> <p>5 Helen Darion, Mitch Leigh, and he flipped</p> <p>6 through it and showed me his signature, and</p> <p>7 he said, See, I own everything. I said,</p> <p>8 well, you don't own everything because it's</p> <p>9 two out of three. It's me and Helen Darion,</p> <p>10 so what I say goes.</p> <p>11 Q. And you said you don't recall if it</p> <p>12 was a first meeting or a second meeting with</p> <p>13 Mr. Leigh?</p> <p>14 A. Mitch, right. It wasn't in San</p> <p>15 Francisco, it was in his office.</p> <p>16 Q. So it was the first meeting, you</p> <p>17 believe?</p> <p>18 A. I don't think so.</p> <p>19 Q. So in that second meeting, was there</p> <p>20 any phone call to Mr. Honig?</p> <p>21 A. No.</p> <p>22 Q. Was Mr. Honig present?</p> <p>23 A. No, he was not present.</p> <p>24 Q. Can you describe for me in any more</p> <p>25 detail the document that Mr. Leigh showed</p>	<p style="text-align: right;">Page 212</p> <p>1 Robyn Abraham</p> <p>2 seeing his power of attorney and it</p> <p>3 referenced Man of La Mancha. I remember</p> <p>4 those three points.</p> <p>5 Q. When was the next time subsequent to</p> <p>6 January 6, 2014 that you spoke to Alan Honig?</p> <p>7 A. I don't think I spoke with him. I</p> <p>8 think I may have sent him an e-mail asking</p> <p>9 about due diligence on Man of La Mancha and</p> <p>10 what was done, and who owned what. I may</p> <p>11 have tried to call him. I remember him not</p> <p>12 being happy I called him from the car,</p> <p>13 because there was a lot of noise and he</p> <p>14 didn't like that. He was like, Well, if</p> <p>15 you've got something to say go to an office</p> <p>16 so I can hear you.</p> <p>17 And I asked him very specifically</p> <p>18 about the stage rights, London, Broadway,</p> <p>19 movie rights, any other contracts that had</p> <p>20 been signed, and I asked him about Tam's,</p> <p>21 Woodmark and Musicscope, and who owned what,</p> <p>22 and whether the rights were available.</p> <p>23 MR. LAFAYETTE: Okay. Why</p> <p>24 don't we take a ten-minute break?</p> <p>25 VIDEOGRAPHER: The time is 4:35</p>
<p style="text-align: right;">Page 211</p> <p>1 Robyn Abraham</p> <p>2 you?</p> <p>3 A. Well, it looked like a power of</p> <p>4 attorney. It was maybe about ten pages long.</p> <p>5 And I saw Helen Darion, I saw his name, and</p> <p>6 just really just glanced at it. I asked him</p> <p>7 for a copy, and he said, No, you can't have</p> <p>8 it. And that was it.</p> <p>9 Q. And did you -- did the document say</p> <p>10 power of attorney on it?</p> <p>11 A. It said power of attorney, Helen</p> <p>12 Darion.</p> <p>13 Q. There was a title on it that said</p> <p>14 power of attorney?</p> <p>15 A. Power of attorney, and underneath it</p> <p>16 said Helen Darion.</p> <p>17 Q. Do you know what date that document</p> <p>18 was dated?</p> <p>19 A. I think it was like late 1990s.</p> <p>20 Q. And do you recall any of the wording</p> <p>21 of that document?</p> <p>22 A. No. He made sure I didn't -- I</p> <p>23 wasn't able to read the whole thing, but it</p> <p>24 was signed and countersigned. It may have</p> <p>25 said Helen and Joe Darion, but I do remember</p>	<p style="text-align: right;">Page 213</p> <p>1 Robyn Abraham</p> <p>2 p.m. and we are off the record.</p> <p>3 (Whereupon, a brief recess was</p> <p>4 taken.)</p> <p>5 VIDEOGRAPHER: The time is 4:50</p> <p>6 p.m. and we are back on the record.</p> <p>7 MR. LAFAYETTE: I'm going to</p> <p>8 mark as Abraham Exhibit 36 a document</p> <p>9 bearing Bates stamp ABR 000431.</p> <p>10 (Whereupon, at this time, the</p> <p>11 reporter marked the above-mentioned</p> <p>12 e-mail as Abraham Exhibit 36 for</p> <p>13 identification.)</p> <p>14 BY MR. LAFAYETTE:</p> <p>15 Q. Ms. Abraham, is this a true and</p> <p>16 correct copy of an e-mail chain that was</p> <p>17 forwarded to you by Beverly Diamond on</p> <p>18 December 16, 2013?</p> <p>19 A. I vaguely remember this. I kind of</p> <p>20 tuned out on real estate. But it looks</p> <p>21 familiar, so I -- if you got it from me, I</p> <p>22 assume it's correct.</p> <p>23 Q. And is this one of the documents</p> <p>24 that you provided to your attorneys at</p> <p>25 Schillings?</p>

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<p style="text-align: right;">Page 214</p> <p>1 Robyn Abraham</p> <p>2 A. Yes. Whatever I had, I sent them</p> <p>3 everything.</p> <p>4 Q. Okay. And do you recall if this</p> <p>5 document was not in e-mail form, do you</p> <p>6 recall if you printed this document out?</p> <p>7 A. I don't recall how it got to</p> <p>8 Schillings. But it got to Schillings, so</p> <p>9 I -- if it didn't come from a forward, it was</p> <p>10 printed out by me.</p> <p>11 Q. And can I just -- how did you --</p> <p>12 after you printed the documents out, how did</p> <p>13 you get them to Schillings? Did you scan</p> <p>14 them and send them?</p> <p>15 A. They were scanned in.</p> <p>16 Q. And sent to them?</p> <p>17 A. Yes.</p> <p>18 Q. And you used a scanner for that?</p> <p>19 A. Yes.</p> <p>20 Q. Did you ever convert any documents</p> <p>21 to a PDF form?</p> <p>22 MS. SHIN: Objection to form.</p> <p>23 A. Pardon me?</p> <p>24 MS. SHIN: Objection to form.</p> <p>25 A. Not that I recall.</p>	<p style="text-align: right;">Page 216</p> <p>1 Robyn Abraham</p> <p>2 something about Abraham Exhibit 36. Could</p> <p>3 you go back to that document?</p> <p>4 A. Yes.</p> <p>5 Q. Did you edit or alter this document</p> <p>6 at all?</p> <p>7 A. No, I don't even know if I recognize</p> <p>8 it. But I didn't alter or edit anything.</p> <p>9 Q. Okay. And is this a true and</p> <p>10 correct copy of the e-mail that was forwarded</p> <p>11 to you by Beverly Diamond, e-mail chain that</p> <p>12 was forwarded to you by Beverly Diamond?</p> <p>13 A. It says it was forwarded, so I'm</p> <p>14 assuming she had sent me whatever this is.</p> <p>15 Q. Okay. An if you'll take a look at</p> <p>16 what was marked as Abraham Exhibit 39?</p> <p>17 A. I don't have 39.</p> <p>18 Q. I'm sorry, if you can take a look at</p> <p>19 what's been marked as Abraham Exhibit 38.</p> <p>20 And if you could look at the e-mail from --</p> <p>21 on the second page from Beverly Diamond to</p> <p>22 Tom Bavino CCing you, dated December 16, 2013</p> <p>23 at 2:01 p.m.</p> <p>24 Do you see that? Do you see that</p> <p>25 e-mail?</p>
<p style="text-align: right;">Page 215</p> <p>1 Robyn Abraham</p> <p>2 MR. LAFAYETTE: I'm going to</p> <p>3 mark as Abraham Exhibit 37 a document</p> <p>4 that's Bates stamped Leigh 000249.</p> <p>5 (Whereupon, at this time, the</p> <p>6 reporter marked the above-mentioned</p> <p>7 e-mail as Abraham Exhibit 37 for</p> <p>8 identification.)</p> <p>9 BY MR. LAFAYETTE:</p> <p>10 Q. Ms. Abraham, is this a copy of an</p> <p>11 e-mail chain that you were copied on by</p> <p>12 Beverly Diamond?</p> <p>13 A. I don't know. As I said, the</p> <p>14 contents look familiar. But I don't think</p> <p>15 this is one of my documents.</p> <p>16 MR. LAFAYETTE: And I'm going</p> <p>17 to mark as exhibit Abraham Exhibit 38</p> <p>18 a two-page document that bears Bates</p> <p>19 stamps ABR 001201 and ABR 001202.</p> <p>20 (Whereupon, at this time, the</p> <p>21 reporter marked the above-mentioned</p> <p>22 e-mail as Abraham Exhibit 38 for</p> <p>23 identification.)</p> <p>24 BY MR. LAFAYETTE:</p> <p>25 Q. Ms. Abraham, I forgot to ask you</p>	<p style="text-align: right;">Page 217</p> <p>1 Robyn Abraham</p> <p>2 A. Yes.</p> <p>3 Q. And if you can go back to Abraham</p> <p>4 Exhibit 36, and do you see the e-mail from</p> <p>5 Beverly Diamond to Tom Bavino CCing you at</p> <p>6 December 16, 2013 at 2:01 p.m.?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And if you would look at the</p> <p>9 last sentence of that, the second to last</p> <p>10 sentence in that e-mail, which says, Please</p> <p>11 let me know, begins with, Please let me know.</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And do you know why the sentences in</p> <p>15 exhibit -- those sentences in Exhibit 36 and</p> <p>16 Exhibit 38 are different?</p> <p>17 A. No.</p> <p>18 (Witness peruses document.)</p> <p>19 A. No, I don't.</p> <p>20 MR. LAFAYETTE: I'm going to</p> <p>21 mark as Abraham Exhibit 39 a document</p> <p>22 that bears Bates stamps ABR 000580.</p> <p>23 (Whereupon, at this time, the</p> <p>24 reporter marked the above-mentioned</p> <p>25 e-mail as Abraham Exhibit 39 for</p>

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<p style="text-align: right;">Page 222</p> <p>1 Robyn Abraham</p> <p>2 up?</p> <p>3 A. No. I mean, whatever I wrote up was</p> <p>4 sent back to Lisa for his comments.</p> <p>5 Q. In an e-mail?</p> <p>6 A. I don't remember how it was</p> <p>7 provided, but I do remember that whatever he</p> <p>8 dictated was sent back. It may have been</p> <p>9 faxed to him, I don't recall exactly how it</p> <p>10 was provided. But it was provided in a draft</p> <p>11 form for his review.</p> <p>12 Q. Was it a draft agreement for his</p> <p>13 review?</p> <p>14 A. It was a draft agreement.</p> <p>15 Q. And that would have been sent by you</p> <p>16 to Mr. Leigh?</p> <p>17 A. It would have been sent from me to</p> <p>18 his office. He didn't do his own e-mail or</p> <p>19 he had Lisa review everything.</p> <p>20 MR. LAFAYETTE: I'm going to</p> <p>21 mark as Abraham Exhibit 41 a document</p> <p>22 that bears Bates stamps ABR 000438.</p> <p>23 (Whereupon, at this time, the</p> <p>24 reporter marked the above-mentioned</p> <p>25 e-mail as Abraham Exhibit 41 for</p>	<p style="text-align: right;">Page 224</p> <p>1 Robyn Abraham</p> <p>2 A. Beverly told me that.</p> <p>3 Q. Okay.</p> <p>4 MR. LAFAYETTE: I'm going to</p> <p>5 mark as Abraham Exhibit 42 a document</p> <p>6 bearing Bates stamp ABR 003145.</p> <p>7 Strike that, I'm going to do a</p> <p>8 different one. I'm going to mark as</p> <p>9 Abraham Exhibit 42 a document bearing</p> <p>10 Bates stamps ABR 006608.</p> <p>11 (Whereupon, at this time, the</p> <p>12 reporter marked the above-mentioned</p> <p>13 e-mail as Abraham Exhibit 42 for</p> <p>14 identification.)</p> <p>15 BY MR. LAFAYETTE:</p> <p>16 Q. Ms. Abraham, is the e-mail on the</p> <p>17 top of the page, dated January 10, 2014,</p> <p>18 10:21 a.m. a true and correct copy of an</p> <p>19 e-mail that you sent to Martha Wasserman?</p> <p>20 A. To the best of my knowledge, yes.</p> <p>21 Q. Is this an authentic document?</p> <p>22 MS. SHIN: Objection to form.</p> <p>23 A. To the best of my knowledge, yes.</p> <p>24 Q. And the e-mail at the bottom of the</p> <p>25 page, is this a true and correct copy of an</p>
<p style="text-align: right;">Page 223</p> <p>1 Robyn Abraham</p> <p>2 identification.)</p> <p>3 BY MR. LAFAYETTE:</p> <p>4 Q. Ms. Abraham, can you tell me how you</p> <p>5 received this e-mail?</p> <p>6 A. Beverly occasionally would forward</p> <p>7 e-mails to me and CC or BCC me. I don't know</p> <p>8 how I got this particular one. She may have</p> <p>9 given me a copy. I don't remember</p> <p>10 specifically exactly how I got this one.</p> <p>11 Q. Okay. And is this an authentic</p> <p>12 e-mail to your understanding?</p> <p>13 A. Well, I didn't write it --</p> <p>14 MS. SHIN: Objection to the</p> <p>15 form.</p> <p>16 A. To the best of my knowledge, yes.</p> <p>17 Q. Did you create this e-mail?</p> <p>18 A. No.</p> <p>19 Q. Do you know anyone other than</p> <p>20 Beverly Diamond that may have created this</p> <p>21 e-mail?</p> <p>22 A. My understanding was Beverly had</p> <p>23 sent this e-mail to Lisa Maldonado.</p> <p>24 Q. And what is your understanding based</p> <p>25 upon?</p>	<p style="text-align: right;">Page 225</p> <p>1 Robyn Abraham</p> <p>2 e-mail that was sent to you by Martha</p> <p>3 Wasserman on January 10, 2014 at 11:58 a.m.?</p> <p>4 A. To the best of my knowledge, yes.</p> <p>5 Q. And is this one of the documents</p> <p>6 that you printed out and provided your</p> <p>7 attorneys?</p> <p>8 A. To the best of my knowledge, yes.</p> <p>9 Q. Okay. And you notice that the --</p> <p>10 well, let me ask you this.</p> <p>11 Is the e-mail on the bottom</p> <p>12 Mrs. Wasserman's response to your e-mail at</p> <p>13 the top of the page?</p> <p>14 A. I don't know.</p> <p>15 Q. Does it appear to be?</p> <p>16 A. I don't know.</p> <p>17 Q. If you notice it, they both have the</p> <p>18 same subject matter line, correct?</p> <p>19 A. Yes, I see they have the same</p> <p>20 subject matter.</p> <p>21 Q. Okay. And you notice that in the</p> <p>22 bottom e-mail, where it says to R. Abraham,</p> <p>23 there is quotes around R. Abraham, both in</p> <p>24 the beginning and the end, do you see that?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 226</p> <p>1 Robyn Abraham</p> <p>2 Q. And at the top e-mail you see R.</p> <p>3 Abraham. There is no quote before the R and</p> <p>4 there is a quote after the word Abraham in</p> <p>5 the from line?</p> <p>6 A. I see what it says.</p> <p>7 Q. Okay. Do you know why that would</p> <p>8 be?</p> <p>9 A. No, I do not.</p> <p>10 Q. And in your experience, is an e-mail</p> <p>11 that responds to another e-mail on the top of</p> <p>12 the page or at the bottom of the page?</p> <p>13 MS. SHIN: Objection to form.</p> <p>14 A. I don't know.</p> <p>15 Q. Let me reword that.</p> <p>16 In your experience, when someone</p> <p>17 responds to an e-mail, does that e-mail</p> <p>18 appear above the e-mail to which it is</p> <p>19 responding?</p> <p>20 A. I don't know.</p> <p>21 Q. Have you ever seen an e-mail where</p> <p>22 the e-mail responding to an e-mail is on the</p> <p>23 bottom?</p> <p>24 MS. SHIN: Objection to form.</p> <p>25 A. I --</p>	<p style="text-align: right;">Page 228</p> <p>1 Robyn Abraham</p> <p>2 Q. Did you create the e-mail from</p> <p>3 Martha Wasserman to yourself?</p> <p>4 A. No.</p> <p>5 MR. LAFAYETTE: I'm going to</p> <p>6 mark as Abraham Exhibit 43 a document</p> <p>7 that's Bates stamped ABR 000489.</p> <p>8 (Whereupon, at this time, the</p> <p>9 reporter marked the above-mentioned</p> <p>10 e-mail as Abraham Exhibit 43 for</p> <p>11 identification.)</p> <p>12 BY MR. LAFAYETTE:</p> <p>13 Q. Ms. Abraham, is this a true and</p> <p>14 correct copy of an e-mail that you received</p> <p>15 from Lisa Maldonado on January 15, 2014?</p> <p>16 A. According to what it says, I suspect</p> <p>17 it is, yes.</p> <p>18 Q. Okay. And is it an authentic</p> <p>19 e-mail --</p> <p>20 MS. SHIN: Objection.</p> <p>21 Q. -- to your understanding?</p> <p>22 MS. SHIN: Objection to form.</p> <p>23 A. It's what Mitch told me as well, so</p> <p>24 I believe it is accurate.</p> <p>25 MR. LAFAYETTE: I'm going to</p>
<p style="text-align: right;">Page 227</p> <p>1 Robyn Abraham</p> <p>2 Q. Other than this instance?</p> <p>3 A. I haven't looked for one before, so</p> <p>4 I really don't know.</p> <p>5 Q. Does this seem peculiar to you?</p> <p>6 MS. SHIN: Objection to form.</p> <p>7 A. After what I've been through with Go</p> <p>8 Daddy, no, nothing seems peculiar to me, no.</p> <p>9 Q. So you believe this is an issue with</p> <p>10 Go Daddy?</p> <p>11 A. Well, I don't know. I'm not an IT</p> <p>12 person.</p> <p>13 Q. And is this -- are these authentic</p> <p>14 e-mails?</p> <p>15 MS. SHIN: Objection to form.</p> <p>16 A. To the best of my knowledge, yes.</p> <p>17 Q. Did you type both of these e-mails?</p> <p>18 A. I didn't type -- I probably sent the</p> <p>19 Friday e-mail, because it says I did. That's</p> <p>20 it.</p> <p>21 Q. The Friday e-mail at the --</p> <p>22 A. To Martha.</p> <p>23 Q. To Martha?</p> <p>24 A. Yes. That's, it says it's my</p> <p>25 e-mail.</p>	<p style="text-align: right;">Page 229</p> <p>1 Robyn Abraham</p> <p>2 mark as Abraham Exhibit 44 an</p> <p>3 e-mail -- I'm sorry, a document which</p> <p>4 is Bates stamped ABR 003112.</p> <p>5 (Whereupon, at this time, the</p> <p>6 reporter marked the above-mentioned</p> <p>7 e-mail as Abraham Exhibit 44 for</p> <p>8 identification.)</p> <p>9 BY MR. LAFAYETTE:</p> <p>10 Q. Ms. Abraham, is the top e-mail a</p> <p>11 true and correct copy of an e-mail that you</p> <p>12 sent to Martha Wasserman on January 20, 2014,</p> <p>13 at 11:08 a.m.?</p> <p>14 (Witness peruses document.)</p> <p>15 A. It looks accurate to the best of my</p> <p>16 knowledge.</p> <p>17 Q. And is the e-mail on the bottom of</p> <p>18 the page an e-mail that you received from</p> <p>19 Martha Wasserman on January 20, 2014?</p> <p>20 A. To the best of my knowledge, yes.</p> <p>21 Q. And is it a true and correct copy?</p> <p>22 A. To the best of my knowledge, yes.</p> <p>23 Q. And did you in any way create the</p> <p>24 e-mail from Martha Wasserman to R. Abraham</p> <p>25 dated January 20, 2014 at 11:51 a.m. that's</p>

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<p style="text-align: right;">Page 230</p> <p>1 Robyn Abraham</p> <p>2 reflected in this document?</p> <p>3 A. No.</p> <p>4 Q. Do you know if anybody else did</p> <p>5 other than Martha Wasserman?</p> <p>6 A. I believe Martha Wasserman sent me</p> <p>7 what she sent me.</p> <p>8 Q. And, again, if you look at the -- is</p> <p>9 the bottom e-mail a response to the top</p> <p>10 e-mail, to your knowledge?</p> <p>11 A. I don't know.</p> <p>12 Q. And can I ask you why were you still</p> <p>13 communicating directly with Martha Wasserman</p> <p>14 on January 20, 2014 when she had earlier</p> <p>15 requested that you only correspond with her</p> <p>16 attorney?</p> <p>17 MS. SHIN: Objection to form.</p> <p>18 A. Because Martha would send that, copy</p> <p>19 Nan, and then call me a day or two later and</p> <p>20 ask me what's going on. And I wasn't</p> <p>21 representing Martha as a lawyer. So she</p> <p>22 wanted to know what was going on, so I let</p> <p>23 her know what was going on.</p> <p>24 Q. Do you know why this document does</p> <p>25 not exist in e-mail format?</p>	<p style="text-align: right;">Page 232</p> <p>1 Robyn Abraham</p> <p>2 familiar that I had, yes.</p> <p>3 Q. The one that's at 10:19 a.m. at the</p> <p>4 top of the page?</p> <p>5 A. Yes.</p> <p>6 Q. And is that an authentic e-mail?</p> <p>7 A. I can't hear you.</p> <p>8 MS. SHIN: Objection to form.</p> <p>9 Q. Is that an authentic e-mail?</p> <p>10 MS. SHIN: Objection to the</p> <p>11 form.</p> <p>12 A. To the best of my knowledge, yes.</p> <p>13 Q. And is the e-mail at the bottom from</p> <p>14 Dale Wasserman at cox dot net to R. Abraham,</p> <p>15 is that a response by Martha Wasserman to</p> <p>16 your e-mail, to your knowledge?</p> <p>17 A. I don't know if it's a response, but</p> <p>18 it does look familiar.</p> <p>19 Q. And again, at the top of the page,</p> <p>20 there's no quotation mark in the from before</p> <p>21 R. Abraham.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Do you know why that is?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 231</p> <p>1 Robyn Abraham</p> <p>2 MS. SHIN: Objection to form.</p> <p>3 Foundation.</p> <p>4 A. I do not.</p> <p>5 MR. LAFAYETTE: I'm going to</p> <p>6 mark as Abraham Exhibit 45, a one</p> <p>7 page document which is Bates stamped</p> <p>8 ABR 003113.</p> <p>9 (Whereupon, at this time, the</p> <p>10 reporter marked the above-mentioned</p> <p>11 e-mail as Abraham Exhibit 45 for</p> <p>12 identification.)</p> <p>13 BY MR. LAFAYETTE:</p> <p>14 Q. Taking a look at what's been marked</p> <p>15 as Abraham Exhibit 45, the top e-mail is an</p> <p>16 e-mail from R. Abraham to Dale Wasserman at</p> <p>17 cox dot net, do you understand Dale Wasserman</p> <p>18 at cox dot net to be Martha Wasserman's</p> <p>19 e-mail address?</p> <p>20 A. As far as I know, I think she had</p> <p>21 used another one at one point but that does</p> <p>22 ring a bell.</p> <p>23 Q. Is this an e-mail that you sent to</p> <p>24 Martha Wasserman?</p> <p>25 A. The Friday, February 28th one looks</p>	<p style="text-align: right;">Page 233</p> <p>1 Robyn Abraham</p> <p>2 Q. Do you know why there's no re in the</p> <p>3 subject matter of the e-mail on the bottom?</p> <p>4 A. No.</p> <p>5 Q. Do you know why the e-mail at the</p> <p>6 bottom -- why -- strike that.</p> <p>7 And going back to Abraham Exhibit</p> <p>8 44, again, if you look at the top of the page</p> <p>9 in the from line there's no quotation mark</p> <p>10 before R. Abraham.</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know why that is?</p> <p>14 A. No.</p> <p>15 MR. LAFAYETTE: Can we go off</p> <p>16 the record for one second.</p> <p>17 VIDEOGRAPHER: Sure. The time</p> <p>18 is 5:29 p.m. and we are off the</p> <p>19 record.</p> <p>20 (Discussion held off the</p> <p>21 record.)</p> <p>22 VIDEOGRAPHER: The time is 5:31</p> <p>23 p.m., we're back on the record.</p> <p>24 MR. LAFAYETTE: I'm going to</p> <p>25 mark as Abraham Exhibit 46 a two-page</p>